

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

**ALVA JOHNSON,
Individually and On Behalf of All Others
Similarly Situated,**

Plaintiff,

Case No. 8:19-cv-00475-WFJ-SPF

v.

**DONALD J. TRUMP,
In his Individual Capacity and
DONALD J. TRUMP FOR
PRESIDENT, INC.**

Defendants.

**DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.'S
UNOPPOSED MOTION TO EXTEND TIME TO RESPOND TO COMPLAINT**

Defendant Donald J. Trump for President Inc. (the “Campaign”) respectfully moves, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure (“FRCP”), for an order extending the time within which the Campaign may respond to plaintiff Alva Johnson’s (“Plaintiff”) Complaint to May 10, 2019. In support of this unopposed motion, the Campaign states as follows:

1. Plaintiff commenced this action through the filing of her Complaint on February 25, 2019. [ECF No. 1.]
2. Plaintiff served the Complaint on the Campaign on March 1, 2019. [ECF No. 12.]
3. Pursuant to FRCP Rule 12, the Campaign’s response is currently due March 22, 2019.
4. The Campaign has obtained a stipulation from Plaintiff’s counsel to extend the deadline for the Campaign to respond in any manner, including by way of answer,

motion or other pleading of any type, to the Complaint from March 22, 2019 to May 10, 2019, the same date that defendant Donald J. Trump's response is due to the Complaint. [ECF No. 16.]

5. FRCP Rule 6(b) gives the Court discretion to grant a motion to extend a deadline for good cause prior to expiration of the deadline. The deadline for the Campaign to file its response to the Complaint has not yet expired and there is good cause to grant the instant motion. The extension sought by this unopposed motion will afford the Campaign additional time to review and analyze the factual allegations and legal theories in the Complaint, which is necessary for the Campaign to prepare an appropriate response thereto.
6. No other extensions have been sought by the Campaign in this case. Furthermore, this unopposed motion is made in good faith and is not interposed for the purpose of delay or prejudice.

WHEREFORE, the Campaign respectfully requests that the Court enter an order granting the Campaign an extension to respond to Plaintiff's Complaint until May 10, 2019.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), counsel for the Campaign has conferred with counsel for Plaintiff, and counsel for Plaintiff has agreed to the requested extension.

Dated this 15th day of March, 2019.

[Signature appears on next page]

FORDHARRISON^{LLP}

/s/ Dawn Siler-Nixon

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Donald J. Trump for President, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 15, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will electronically send a notice of electronic filing upon the following:

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